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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE OPTICAL DISK DRIVE ANTITRUST
LITIGATION

Case No. 3:15-cv-06325 RS

Master File No. 3:10-md-2143 RS

This document relates to:

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING SERVICE OF
PROCESS AND DEADLINES TO
RESPOND TO COMPLAINT**

Peter Kravitz, as Trustee for the RSH
Liquidating Trust,

Plaintiff,

v.

Sony Corporation, et al.,

Defendants.

1 WHEREAS, on December 30, 2015, Peter Kravitz, as Trustee for the RSH Liquidating
2 Trust ("Plaintiff") filed the above-captioned action.

3 It is stipulated by and between the undersigned parties, by and through their respective
4 attorneys, that for purposes of this action only:

5 1. Undersigned counsel of Boies, Schiller & Flexner LLP agree to accept service of
6 process of the Complaint filed by Plaintiff on December 30, 2015 on behalf of Defendants Sony
7 Optiarc America Inc. and Sony Electronics Inc.

8 2. Undersigned counsel of Boies, Schiller & Flexner LLP agree on behalf of their
9 clients Defendants Sony Corporation ("Sony Corp.") and Sony Optiarc Inc. ("Sony Optiarc") that
10 Plaintiff may serve the Complaint filed by Plaintiff on December 30, 2015 on Sony Corp. and
11 Sony Optiarc in Japan via certified mail or United Parcel Service.

12 3. Undersigned counsel of O'Melveny & Myers LLP agree to accept service of
13 process of the Complaint filed by Plaintiff on December 30, 2015 on behalf of Defendants
14 Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc.

15 4. Undersigned counsel of Latham & Watkins LLP agree to accept service of process
16 of the Complaint filed by Plaintiff on December 30, 2015 on behalf of Defendants Toshiba
17 Corporation, Toshiba America Information Systems, Inc., Toshiba Samsung Storage Technology
18 Corp., and Toshiba Samsung Storage Technology Korea Corp.

19 5. Undersigned counsel of Baker Botts LLP agree to accept service of process of the
20 Complaint filed by Plaintiff on December 30, 2015 on behalf of Defendants Lite-On IT Corp.,
21 Lite-On Sales & Distribution Inc., Koninklijke Philips N.V., Philips Electronics North America
22 Corporation, Philips & Lite-On Digital Solutions Corp., and Philips & Lite-On Digital Solutions
23 USA, Inc.

24 6. All Defendants shall answer or otherwise respond to the Complaint no later than
25 May 4, 2016.

7. If any Defendants respond by moving to dismiss the Complaint, Plaintiff's opposition to any such motion(s) shall be due sixty (60) days thereafter, and any reply brief(s) shall be due thirty (30) days thereafter.

8. This Stipulation does not constitute a waiver by Defendants of any defense, including but not limited to those defenses provided under Rule 12 of the Federal Rules of Civil Procedure.

IT IS SO STIPULATED.

DATED: April 12, 2016

KLEE, TUCHIN, BOGDANOFF & STERN LLP

/s/ Colleen M. Keating

Colleen M. Keating

Attorneys for Plaintiff Peter Kravitz, as Trustee for the RSH Liquidating Trust

DATED: April 12, 2016

LATHAM & WATKINS LLP

/s/ Belinda S Lee

Belinda S Lee

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Attorneys for Defendants Toshiba Corporation, Toshiba America Information Systems, Inc., Toshiba Samsung Storage Technology Corp., and Toshiba Samsung Storage Technology Korea Corp.

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1
2 DATED: April 12, 2016

O'MELVENY & MYERS LLP

3
4 /s/ Ian Simmons

5 Ian Simmons
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11 *Attorneys for Defendants Samsung Electronics Co. Ltd.*
12 *and Samsung Electronics America, Inc.*

13
14 DATED: April 12, 2016

BAKER BOTTS LLP

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25 *& Lite-On Digital Solutions Corp., and Philips & Lite-*
26 *On Digital Solutions USA, Inc.*

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DATED: April 12, 2016

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/s/ John F. Cove, Jr.

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*Attorneys for Defendants Sony Optiarc America Inc.,
Sony Electronics Inc., Sony Corporation, and Sony
Optiarc Inc.*

ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories.

DATED: April 12, 2016

/s/ Colleen M. Keating

Colleen M. Keating

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 4/13, 2016



Hon. Richard Seeborg
United States District Judge